

DISTRICT OF MASSACHUSETTS

GREGORY DONNELLY }
PETITIONER, } CIVIL ACTION
V. }
BERNARD BRADY, SUPERINTENDENT } NO-04-12706-RWZ
OLD COLONY CORRECTION CENTER, }
RESPONDENT, }

PETITIONER'S MOTION TO ENLARGE TIME

NOW COMES THE PETITIONER, GREGORY DONNELLY, ACTING PRO. SE, IN THE ABOVE ENTITLED CASE, AND RESPECTFULLY MOVES THIS HONORABLE COURT, PURSUANT TO RULE 6(b)(1-2), FED. R. CIVIL P., TO ENLARGE THE ~~TIME~~ WITHIN WHICH TO RESPOND TO THE RESPONDENT'S SUPPLEMENTARY BRIEF FILED BY THE RESPONDENT AND/OR HIS ATTORNEY ON AUGUST 26, 2005.

AS GROUNDS THEREFORE, MOVANT STATES THAT HE IS PROCEEDING PRO SE DUE TO HIS STATUS AS A PRISONER CONFINED UNDER

SENTENCE TO THE MIDDLESEX COUNTY HOUSE OF CORRECTION. THAT SAID INSTITUTION IS WITHOUT ADEQUATE LAW LIBRARY FACILITIES TO PROPERLY RESPOND TO THE RESPONDENT'S CLAIMS AND/OR ARGUMENTS. AS SUCH, MOVANT IS FORCED TO SEEK LEGAL ASSISTANCE FROM OUTSIDE OF THE JAIL SYSTEM FOR ANY AND ALL LEGAL RESEARCH REGARDING THE ISSUES PRESENTED BEFORE THE COURT -- THAT IS, RESPONDENT'S SUPPLEMENTARY BRIEF TO THIS PETITIONER'S PETITION FOR A WRIT OF HABEAS CORPUS AND A PETITION FOR BAIL PENDING ACTION ON THE SAID HABEAS APPLICATION. UNDER THE PRESENT CIRCUMSTANCES, THE RESPONDENT WILL NOT BE HARMED BY ANY SAID ENLARGEMENT OF THE GRANTED IN THIS ACTION AS THE PETITIONER WOULD REMAIN INCARCERATED UNDER HIS SENTENCE UNLESS AND UNTIL THIS COURT EITHER GRANTS BAIL OR CAUSES THE WRIT OF HABEAS CORPUS TO ISSUE.

WHEREFORE, IT IS RESPECTFULLY
PRAYED THIS HONORABLE COURT GRANT THIS
MOTION ENLARGING TIME TO REPLY UNTIL
SEPT 26, 2005 FOR THE REASONS SET FORTH
HEREIN, OR FOR ANY AND ALL OTHER REASONS
THIS COURT MAY DEEM JUST IN THE PREMISES.

SEPT 8, 2005

RESPECTFULLY SUBMITTED

Gregory Donnelly

GREGORY DONNELLY, PRO SE
PETITIONER
269 TREBLE CROWN RD
Billerica, MA. 01862

CERTIFICATE OF SERVICE

I GREGORY DONNELLY, DO HEREBY CERTIFY THAT
I HAVE SERVED A COPY OF THE ABOVE PLEADING TO THE
ATTORNEY FOR THE RESPONDENT, BY PLACING SAID IN THE
INSTITUTIONAL MAIL BOX, POSTAGE PAID FIRST CLASS
ADDRESSED, RANDALL RAVITZ, ASS ATTORNEY GENERAL,
CRIMINAL BUREAU, ONE ASHBURTON PLACE, BOSTON, MA.
02108. DATE SEPT 8, 2002

Gregory Donnelly
GREGORY DONNELLY, PRO SE